

Comments on the Buckinghamshire Green Belt Assessment 2026

Little Marlow Green Belt Segment

Assessment Areas: ML009, ML010, ML011, OGB60-1, OGB60-2, OGB60-3, BW020, BW021

Submitted by Save Marlow's Greenbelt

13th March 2026

1. Introduction

- 1.1. This document provides comments from Save Marlow's Greenbelt (SMG) on the eight Assessment Areas (AAs) within the segment of Green Belt that lies in the parish of Little Marlow, between the settlements of Marlow and Bourne End.
- 1.2. SMG objects to the 2026 Green Belt Assessment (GBA) as we contend that the assessment of the Little Marlow segment is unreliable and does not represent a proper evidential base for the forthcoming Buckinghamshire Local Plan.
- 1.3. The assessment fails to comply with the NPPF and the PPG for the following reasons:
 - a. Methodological flaws have resulted in excessively granular Assessment Areas whose cumulative support for the strategic function of the segment has been obscured and artificially diminished.
 - b. The Purpose A and B assessments are based on questionable evidence and unsound reasoning.
 - c. There are unexplained inconsistencies with the 2016 GBA despite there being no material change to the land or relevant regulations.
 - d. It directly contradicts the Council's own evidence to the Planning Inspectorate.
- 1.4. SMG believes it necessary for Buckinghamshire Council to reconsider its assessment of the Little Marlow segment prior to submission of the GBA for approval.

2. Summary of Assessment Areas

- 2.1. Table 1 below summarises the eight AAs, their 2026 scores, and the corresponding 2016 assessments. No material changes to the land, settlement pattern, landscape character, or physical features have occurred since 2016.

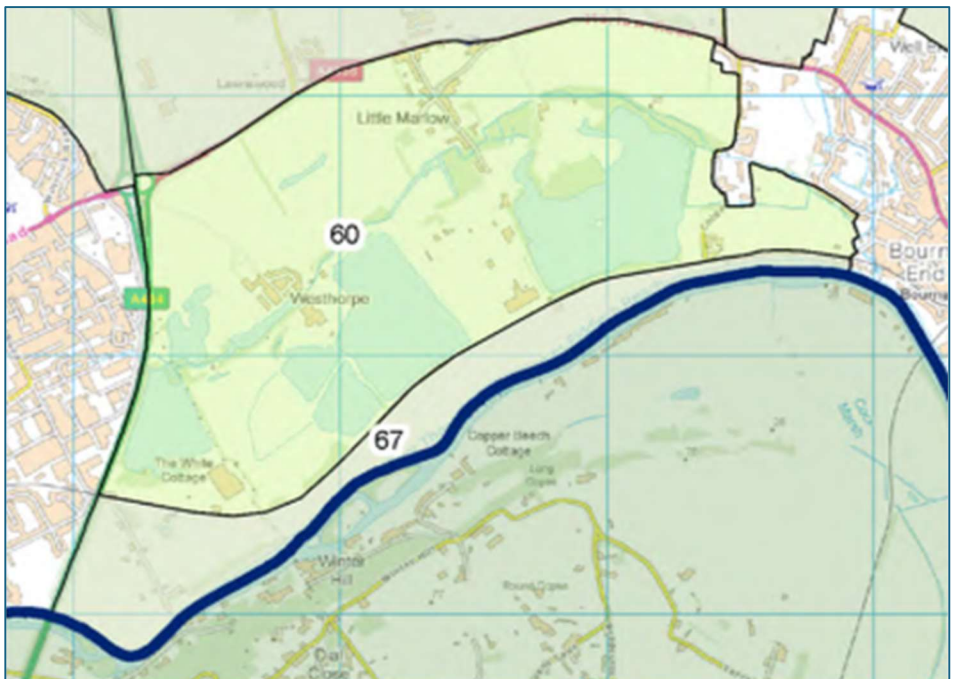
2026 AA	2016 AA	2026 Grey Belt	Purpose A		Purpose B	
			2016	2026	2016	2026
ML009	#60 (NW)	Not	Moderate (3/5)	Strong	Strong (5/5)	Moderate
ML010	#60 (S)	Not	Moderate (3/5)	Strong	Strong (5/5)	Moderate
ML011	#67	Not	Moderate (3/5)	Strong	Strong (5/5)	Moderate
OGB60-1	#60 (N)	Provisional	Moderate (3/5)	Weak	Strong (5/5)	Moderate
OGB60-2	#60 (N)	Not	Moderate (3/5)	Weak	Strong (5/5)	Moderate
OGB60-3	#60 (N)	Provisional	Moderate (3/5)	Weak	Strong (5/5)	Moderate
BW020	#60 (NE)	Provisional	Moderate (3/5)	Weak	Strong (5/5)	Weak
BW021	#60 (NE)	Provisional	Moderate (3/5)	Weak	Strong (5/5)	Moderate

Table 1: Comparison of the 2016 and 2026 Green Belt Assessments

2.2. A map of the 2026 GBA division is shown below



2.3. A map of the 2016 GBA division is shown below



3. Policy Framework

- 3.1. The NPPF (Dec 2025) establishes that the essential characteristics of the Green Belt are openness and permanence and that it serves the following five purposes
 - a. To check the unrestricted sprawl of large built-up areas
 - b. To prevent neighbouring towns merging into one another
 - c. To assist in safeguarding the countryside from encroachment
 - d. To preserve the setting and special character of historic towns
 - e. To assist in urban regeneration
- 3.2. PPG (ID: 64-004-20250225) provides the following guidance relevant to this assessment:
 - a. Assessment areas should be “sufficiently granular to enable the assessment of their variable contribution to Green Belt purposes”
 - b. Authorities should consider “where it may be appropriate to vary the size of assessment areas based on local circumstances”
 - c. The identification of grey belt “informs but does not dictate” decisions
 - d. Authorities must consider whether cumulative releases would “fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area”
- 3.3. The Court of Appeal confirmed in *Mead Realisations Ltd v SSHCLG* [2025] EWCA Civ 32 that the PPG has the same legal status as the NPPF. There is “no legal distinction” between them; both are “statements of national policy issued by the Secretary of State”. The PPG requirements cited above are therefore not merely advisory — they carry the full weight of national planning policy and a failure to comply with them renders an assessment unsound on the same basis as non-compliance with the NPPF itself.

4. Excessive Granularity

- 4.1. The PPG makes clear that it is necessary to divide the Green Belt into assessment areas “for the purpose of identifying grey belt”, not for the purpose of creating it. It goes on to state that assessment areas “should be sufficiently granular to enable the assessment of their variable contribution to Green Belt purposes”.
- 4.2. Accordingly, the level of granularity is “sufficient” if it reveals variations in contribution within a Green Belt segment. It therefore follows that contiguous AAs in a sufficiently divided segment should exhibit a variation in contribution. If they do not, then the divisions are unnecessary and the resulting granularity is excessive.
- 4.3. The GBA divides the Little Marlow segment into eight AAs. However, the scores reveal two blocks of uniformity:
 - a. ML009, ML010 and ML011 are contiguous and all assessed as Strong, Moderate, Weak
 - b. OGB60-1, OGB60-3 and BW021 are contiguous and all assessed as None, Moderate, None. (BW020 is None, Weak, None)

- 4.4. The GBA does not identify any distinguishable features or local circumstances to explain the separation of ML009 from OGB60-1 or the separation of OGB60-3, BW021 and BW020. Therefore, there is no evidence to justify their identification as five separate AAs. This suggests that the divisions are arbitrary and that the resulting granularity of AAs within this segment is excessive.
- 4.5. No material change to the land has occurred since the 2016 GBA when just two AAs were identified in this segment: #67 (corresponding to ML011) and #60 (incorporating all remaining land). Each spans the entire gap between the settlements of Marlow and Bourne End and both were assessed as performing a Strong (5/5) Purpose B function.
- 4.6. Purpose B operates at the scale of settlement gaps, not individual parcels. The 2026 GBA's approach inverts this by arbitrarily and excessively subdividing a coherent gap previously assessed as Strong and rating each fragment in isolation as Moderate or Weak. The subdivisions obscure the cumulative support for the strategic function of the gap rather than revealing any variation within it.
- 4.7. This approach is inconsistent with how Purpose B is being applied in practice. In the Beaconsfield appeal (APP/K0425/W/24/3306116, February 2025), the Inspector found that an appeal site made a strong contribution to Purpose B because the wider strategic parcel of which it formed part performed a strong gap function even though the site itself might play a "lesser role" than more sensitive parts of that parcel.
- 4.8. The 2016 GBA also identified a sub-area RSA-21 to the east of Coldmoorholme Lane, which was noted as providing weaker support for Purpose B due to adjacent built form. Remarkably, there is no corresponding AA in the 2026 GBA for this sub-area meaning that the one area where finer granularity was previously considered appropriate has been absorbed into the wider undifferentiated division.
- 4.9. **The methodology has misinterpreted the PPG guidance and arbitrarily subdivided the land into excessively granular AAs which has manufactured, rather than identified, four areas of potential grey belt. In doing so it has artificially obscured and downgraded the entire segment's support for Purpose B. There is no evidence of local circumstances to justify the selected divisions, there is no variation between contiguous AAs to justify their separation and there has been no material change to the land to justify an alteration in ratings. The GBA therefore does not represent a robust assessment as required by the PPG and does not provide a proportionate evidence base required by NPPF paragraph 35(b)**

5. Cumulative Erosion: The Cross-Dependency Problem

- 5.1. This section demonstrates that the Purpose B assessments for the northern AAs contain a fundamental logical flaw. Each AA's rating is justified, in part, by the assumption that neighbouring AAs will remain open. However, none of those neighbouring AAs are themselves rated Strong for Purpose B. The result is a chain of mutual dependency in which no link in the chain is independently secure. It creates a house of cards.
- 5.2. Table 2 below analyses the Purpose B justification for each of the five northern AAs (those not protected by flood risk or strong Purpose A scores), extracting the implicit or explicit reliance on the persistence of neighbouring land.

AA	Purp B	GBA Justification (Purpose B)	Implicitly relies on	Rating of relied-upon AAs
OGB60-1	Mod	<i>“makes limited contribution to appreciation of the gap. The AA is well screened from the A4155”</i>	Screening implies other land provides the visible gap function	OGB60-2 (Mod), OGB60-3 (Mod), ML009 (Mod)
OGB60-3	Mod	<i>“were the AA to be developed substantial gaps would remain to the west and east”</i>	Explicitly relies on AAs to the west (OGB60-1, ML009) and east (BW021, BW020)	OGB60-1 (Mod), ML009 (Mod), BW021 (Mod), BW020 (Weak)
BW021	Mod	<i>“makes limited contribution to appreciation of the gap. There is limited appreciation of the land from the A4155”</i>	Same screening logic as OGB60-1; gap function displaced to other AAs	OGB60-3 (Mod), BW020 (Weak), OGB60-2 (Mod)
BW020	Weak	<i>“The AA is not visible from the A4155”</i>	Invisibility from one road used to minimise gap function; relies on BW021 and OGB60-3 for visible gap	BW021 (Mod), OGB60-3 (Mod)
ML009	Mod	<i>“makes limited contribution to appreciation of the gap. The AA is influenced by the adjacent dual carriageways”</i>	Road influence used to discount contribution; gap function displaced to OGB60-1 and ML010	OGB60-1 (Mod), ML010 (Mod)

Table 2: Cross-dependency analysis of Purpose B assessments. The highlighted column shows that every AA the GBA implicitly relies upon is itself rated only Moderate or Weak — none is rated Strong. OGB60-3 (pink highlight) is the most explicit example.

- 5.3. The most revealing case is OGB60-3. The GBA explicitly states that development would be acceptable because “substantial gaps would remain to the west and east”. The gaps to the west are OGB60-1 and ML009. The gaps to the east are BW021 and BW020. Yet all four of these AAs are themselves rated Moderate or Weak for Purpose B. The “substantial gaps” that OGB60-3 relies upon are, by the GBA’s own assessment, not strongly contributing to the settlement gap and therefore they cannot, in fact, be relied upon to provide Purpose B support.
- 5.4. This reasoning is circular. Each AA's score treats the openness of its neighbours as a fixed background condition, but those neighbours are assessed on the same basis and none is rated Strong. The entire chain of Moderate and Weak ratings is self-referencing: each depends on a context that is itself contingent on the scores of the others. The "remaining gap" is treated as permanent when it is, in fact, liable to erosion as a direct consequence of grey belt categorisation. No AA in the northern section has an independently secure Purpose B rating. The moment any one is released, the evidential basis for the ratings of its neighbours is undermined.
- 5.5. The NPPF emphasises the permanence of Green Belts (para 142). The PPG structures Green Belt assessment as a five-step process, the fifth of which requires authorities to consider whether cumulative releases would "fundamentally undermine all five Green Belt purposes across the plan area". This is an integral part of the GBA process, not a separate exercise to be conducted later. There is no evidence that this cumulative test has been applied to this segment.
- 5.6. The practical consequences are significant. Research by Marrons Planning (December 2024 to August 2025) found that 80% of major residential grey belt appeals were allowed. Once land is identified as grey belt — even provisionally — development is likely to follow. An assessment that identifies four AAs as potential grey belt within a single fragile gap, without any analysis of cumulative impact, is incomplete on its own terms. The methodology must be rigorous before categorisation, not after.

- 5.7. The assessment identifies four AAs as potential grey belt within a single fragile gap without any analysis of cumulative impact and is therefore incomplete on its own terms. Rather than considering the consequences of cumulative release, the methodology has created the conditions for it.**

6. The A4155 Visibility Fallacy

- 6.1. A recurring feature of the Purpose B justifications for the northern AAs is the discounting of their contribution on the basis that they are “well screened from the A4155” (OGB60-1), offer “limited appreciation of the land from the A4155” (BW021), or are “not visible from the A4155” (BW020). This reasoning fundamentally misapplies Purpose B.
- 6.2. The A4155 is the principal road connecting Marlow and Bourne End. It is the route along which the perception of two separate towns is most apparent. It is precisely from this vantage point that the openness of the gap is most readily experienced by the greatest number of people. If anything, land visible from the A4155 should be regarded as making a stronger contribution to the perceived separation between the settlements, not a weaker one.
- 6.3. The GBA’s characterisation of the northern AAs as “screened” from the A4155 is itself questionable. In reality, there are open views across this land from the road. The “screening” provided by a sporadic and intermittent line of trees along part of the road frontage is not a substantive visual barrier. If these AAs were developed, the development itself would be likely to reduce or remove this tree line thereby exposing the full visual impact of coalescence to users of the A4155.
- 6.4. In any event, Purpose B is not limited to what can be seen from a single road. The PPG’s illustrative features for Purpose B ask whether land forms a “substantial part of the gap” and whether development would result in “a significant reduction in the actual distance” or “loss of visual separation between towns”. Visual separation is assessed from all vantage points including footpaths, a National Landscape to the north, and the settlements themselves — not solely from one road.
- 6.5. The northern AAs collectively form the physical gap between Marlow and Bourne End. Whether that gap is visible from a specific road is not a factor in determining its Purpose B assessment.**

7. The Developability Conflation

- 7.1. ML010 and ML011 are both rated Moderate for Purpose B on the basis that each “comprises a substantial part of the gap between Bourne End and Marlow but the AA is heavily affected by flood risk, which would greatly restrict the scale of any development”.
- 7.2. This conflates developability with gap function. Purpose B considers whether land prevents neighbouring towns from merging. Neither the NPPF nor the PPG identify flood risk or developability as relevant factors in that assessment.
- 7.3. The 2016 GBA assessed this same land (AA #60 and #67) as providing Strong (5/5) support. The flood conditions were identical in 2016. No explanation has been provided for why a factor that has never been relevant to Purpose B, and which has not changed, should now result in a lower rating.

7.4. The GBA’s use of flood risk and developability to discount the Purpose B contribution of ML010 and ML011 is an illegitimate methodological innovation with no policy basis.

8. Inconsistencies with the 2016 Assessment

8.1. Several assessment areas exhibit unexplained changes in scoring between 2016 and 2026 despite no material change to the land. Table 3 analyses the most significant inconsistencies.

AA	Purpose A Inconsistency	Purpose B Inconsistency
ML011	Upgraded from Moderate to Strong. 2026 cites the River Thames corridor and A404. But in 2016, the A404 was cited as justification for the <i>lower</i> score, as a “durable and permanent boundary” that contained sprawl. The 2026 evidence is substantively the same but reaches the opposite conclusion.	Downgraded from Strong (5/5) to Moderate. 2016 described the land as forming “part of the essential gap” where “development would significantly reduce both the perceived and actual distance” between settlements. 2026 acknowledges the same gap function but introduces flood risk as a discounting factor. Flood conditions are unchanged since 2016.
ML010	Upgraded from Moderate to Strong. The 2026 evidence is identical to ML011. The same puzzling reference to the River Thames corridor as “strongly marking the settlement edge” — yet there is no settlement abutting the River Thames in this area.	Downgraded from Strong (5/5) to Moderate. Evidence is identical to ML011. The same flood risk discounting is applied despite identical conditions in 2016.
ML009	Upgraded from Moderate to Strong. This is justified by the Secretary of State’s decision on Marlow Film Studios (para 44). This is the one upgrade with a clear evidential basis.	Downgraded from Strong (5/5) to Moderate. The “limited contribution to appreciation” is attributed to dual carriageway influence. This factor was present in 2016 but did not prevent a Strong rating.

Table 3: Key inconsistencies between 2016 and 2026 assessments. The Purpose A upgrades and Purpose B downgrades are based on substantially the same evidence, applied to reach different conclusions.

8.2. The A404 paradox is particularly concerning. In 2016, land adjacent to the A404 was scored lower for Purpose A precisely because the road itself acted as a strong, durable boundary that contained sprawl. The 2026 approach reverses this reasoning, claiming that adjacent land works “together with” the A404 restrict sprawl, thereby justifying a higher Purpose A score. The same physical feature cannot logically both contain sprawl (reducing the need for Green Belt protection) and require protection (because the land reinforces the boundary). This selective application of logic undermines the methodological robustness required by NPPF paragraph 35(d).

8.3. Taken together, the effect of the inconsistencies is to upgrade Purpose A (which does not affect grey belt status for land not adjacent to a large built-up area in several of the northern AAs) while downgrading Purpose B (which is the decisive factor for grey belt identification in this segment). This pattern is questionable and warrants scrutiny.

8.4. The score changes across both purposes form a consistent pattern. In the southern AAs (ML009, ML010, ML011), Purpose A has been upgraded from Moderate to Strong — which insulates them from grey belt classification regardless of their Purpose B score. In the northern AAs (OGB60-1, OGB60-2, OGB60-3, BW020, BW021), Purpose A has been downgraded from Moderate (as part of AA #60, rated 3/5 in 2016) to Weak. Combined with the universal downgrade of Purpose B from Strong to Moderate or Weak, both relevant purposes have been reduced for the northern AAs, making grey belt classification virtually inevitable.

8.5. The result is a two-tier structure: a protected southern tier where Purpose A upgrades act as a shield, and an exposed northern tier where every score change — across both

purposes — moves in the direction of maximising grey belt identification. No material change to the land has occurred since 2016 to justify changes in either direction. No evidence has been provided to explain why Purpose A should move in opposite directions for adjacent AAs within the same settlement gap.

- 8.6. The circular reasoning identified in Section 5 applies here too. The Purpose A downgrades for the northern AAs rely in part on their position in the middle of the gap, away from the settlement edge. But they occupy that position precisely because the southern AAs lie between them and Marlow. If the southern AAs are assessed as making a Strong contribution to Purpose A, the northern AAs are correspondingly further from the settlement edge — and therefore score lower. The assessment thus uses the strength of the southern AAs to justify the weakness of the northern ones, while the southern AAs' Purpose B downgrades are rendered consequence-free by their Purpose A upgrades. Each tier's scores depend on the other's.
- 8.7. The assessment changes the Purpose A and B score of every AA in the Northern section without there having been any material change to the land. This has resulted in the manufacture, rather than identification, of grey belt. This pattern is difficult to reconcile with an objective, evidence-led methodology and requires explicit justification as none has been provided.**

9. Contradiction with the Council's Own Formal Evidence

- 9.1. The GBA's own narrative at paragraph 7.2.17 describes this segment as "one of the more fragile settlement gaps in the study area" and expresses "concern regarding fundamentally undermining this sector of the Green Belt". This strategic-level assessment directly contradicts the parcel-level scores, which collectively classify four of the eight AAs as potential grey belt.
- 9.2. The Council's March 2025 Grey Belt Assessment and January 2025 Planning Proof of Evidence (prepared for the Marlow Film Studios appeal, APP/K0425/W/22/3351904) described this land as part of an "essential gap" whose open areas are "cumulatively important" for maintaining separation between Marlow and Bourne End.
- 9.3. The Secretary of State's decision on that same appeal (26 November 2025) adds a further dimension. The SoS concluded that the Film Studios site (which spans ML009 and part of ML010) does not constitute grey belt, finding that it makes a strong contribution to Purpose A. He granted permission on "very special circumstances", not grey belt grounds. Notably, the SoS also found that heritage harm existed (less than substantial harm to two Listed Buildings and a Conservation Area) but that the heritage balancing exercise was favourable. This signals a permissive approach to the footnote 7 heritage constraints that currently give OGB60-1 and OGB60-3 only "provisional" grey belt status. This suggests that, under the draft NPPF's proposed removal of the footnote 7 exclusion, these AAs could move from provisional to full grey belt.
- 9.4. It is methodologically unsound and potentially legally inconsistent for the 2026 GBA to downgrade individual contributions to merely Moderate or Weak while the Council has asserted the opposite position in formal evidence submitted to a planning inquiry within the preceding twelve months.**

10. Conclusions

- 10.1. The 2026 GBA's assessment of the Little Marlow Green Belt segment suffers from fundamental methodological flaws:
 - a. Excessive granularity that creates eight AAs where two (or at most three) would be sufficient to reveal variation, and which obscures rather than reveals the strategic function of the gap.
 - b. Circular cross-dependency in Purpose B assessments, where each AA's Moderate or Weak rating is justified by the persistence of neighbouring AAs that are themselves rated Moderate or Weak, creating a chain of mutual dependency that collapses under sequential release and undermines the purpose of the entire segment
 - c. Unexplained inconsistencies with the 2016 assessment, including a reversal of the A404 logic and the erroneous introduction of flood risk as a discounting factor.
 - d. Direct contradiction with the Council's own formal evidence to the Planning Inspectorate, which describes this as an "essential gap" that is "one of the more fragile settlement gaps in the study area".

- 10.2. Consequently, SMG contends that the assessment of the Little Marlow segment of Buckinghamshire Green Belt represents an unsound evidence base for the Buckinghamshire Local Plan and therefore recommends that the Council should:
 - a. Reconsider and revise the assessment for the AAs within the Little Marlow segment.
 - b. Reinstate the Strong Purpose B ratings to reflect the actual collective function of this segment as an essential strategic gap, as was correctly assessed in 2016.
 - c. Reduce the granularity of subdivisions to larger strategic scales that reflect the purposes of the Green Belt, particularly in fragile areas as per local circumstances
 - d. Apply the cumulative release test required by NPPF and PPG to this segment.
 - e. Provide proper justification for all score changes and methodological choices, including boundary definition and AA sizing.

- 10.3. We respectfully request acknowledgement of receipt, a formal response and the opportunity to discuss these concerns.

Yours faithfully,

Sam Kershaw

Director, Save Marlow's Greenbelt

Save Marlow's Greenbelt (SMG) is a volunteer-led community organisation dedicated to protecting the Green Belt around Marlow. The group actively campaigns against inappropriate development and promotes sustainable land use for the benefit of current and future generations. SMG has over 500 members and operates under a formal constitution with a management committee of 12.

SMG is a private company limited by guarantee with registration no. 14697502

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11. Appendix: Referenced Documents

- a. Buckinghamshire Council, Draft Buckinghamshire Green Belt Assessment: Main Report (February 2026).
- b. Buckinghamshire Council, GBA Appendix 10: Proformas (Parcels ML009–011, OGB60-1–3, BW020–21) (February 2026).
- c. John Fannon (on behalf of Buckinghamshire Council), Planning Proof of Evidence: Marlow Film Studios Appeal (APP/K0425/W/22/3351904) (January 2025).
- d. Buckinghamshire Council, Grey Belt Assessment: Marlow Film Studios Appeal Comments (March 2025).
- e. Ove Arup & Partners Ltd, Buckinghamshire Green Belt Assessment: Annex Report 1E (March 2016).
- f. Wycombe District Council, Green Belt Part Two Assessment: Individual Site Assessments (September 2017).
- g. National Planning Policy Framework (December 2024).
- h. Draft National Planning Policy Framework (December 2025), including Annex E: Green Belt Assessment.
- i. Planning Practice Guidance: Green Belt (February 2025).
- j. Mead Realisations Ltd v SSHCLG [2025] EWCA Civ 32 (Court of Appeal, 30 January 2025).
- k. Secretary of State Decision: Marlow Film Studios (APP/K0425/W/24/3351904, 26 November 2025).
- l. Marrons Planning, Grey Belt Research Report (December 2024 – August 2025).